



General Motors LLC  
WFG - Facility Procurement & Contracts  
Warren Tech Center  
MC: 480-111-W65  
30200 Mound Road  
Warren, MI. 48090-9010

7/14/2010

Ms. Pamela Turner  
City of Detroit Water & Sewerage Department  
Office of the Director  
735 Randolph, Room 506  
Detroit, MI. 48226

Re: Account No. 030-1020.301, Service Address 2500 E. Grand Blvd., Detroit MI.

Dear Ms. Turner:

I am writing this letter as a follow up to our discussion at the 2010 Greater Detroit Chamber of Commerce meeting in connection with the above referenced matter. We have had a number of communications with the City of Detroit Water and Sewerage Department, (DWSD), and have been unable to resolve billing issues at the GM Assembly Plant @ 2500 E. Grand Blvd. in Detroit. The billing errors are a result of confusion pertaining to Motors Liquidation Company's, ("MLC"), June 1, 2009, Chapter 11 bankruptcy filing and the purchase of the facility by its new owner, "General Motors Company", on July 10, 2009.

On June 1, 2009, MLC, (f/k/a General Motors Corporation), filed a voluntary petition for relief under Chapter 11 of title 11 of the United States Code, (the "Bankruptcy Code"), in the United States Bankruptcy Court for the Southern District of New York, (the "Bankruptcy Court"). On July 5, 2009, the Bankruptcy Court approved the sale of certain assets including the facility located at 2500 E. Grand Blvd., Detroit Michigan to NGMCO, Inc. The sale transaction occurred on July 10, 2009, and NGMCO, Inc. was renamed General Motors Company.

Effective July 10, 2009, General Motors Company is the new owner of the facility located at 2500 E. Grand Blvd., in Detroit, Michigan. After several discussions between General Motors Company and DWSD, on August 31, 2009, General Motors Company notified DWSD by letter that it was the new owner of the service location and requested that a new account be opened in its name. The new account should not reflect any of Motors Liquidation Company's outstanding balances prior to the July 10, 2009 purchase date. DWSD has filed claims for Motors Liquidation Company's outstanding invoices at the website titled [motorsliquidationdocket.com](http://motorsliquidationdocket.com). Claim # 23034 in the amount of \$4,939.45, and Claim # 23035 in the amount of \$423,595.65.

This letter is a request by General Motors Company to DWSD to remove from its current invoices any of Motors Liquidation Company's outstanding balances including a Previous Activity Balance Brought Forward for sewerage in the amount of \$31,070.80 for the following reasons.

- 1.) DWSD should include this Previous Activity amount in its claim with the bankruptcy court, Detroit Water & Sewerage Department Claim 23034 and 23035 against Motors Liquidation Company.
- 2.) DWSD's claim that occurred in May 2009 is against Motors Liquidation Company, and does not apply to General Motors Company, which came into existence on July 10, 2010. GM's "Previous Activity Amount" belongs to Motors Liquidation Company, and needs to be removed from the General Motors Company invoices.
- 3.) If the DWSD wants to send invoices to Motors Liquidation Company for the "Previous Activity" Amounts until DWSD's bankruptcy claim is resolved, DWSD should send invoices directly to Motors Liquidation Company, and contact its attorney, Mr. Pablo Falabella. Mr. Falabella's telephone number is (212) 310-8050, fax number is (212) 310-8007, and his email is [Pablo.falabella@weil.com](mailto:Pablo.falabella@weil.com).

If the DWSD has any questions about this request, please have your DWSD attorney contact our General Motors Legal Staff Attorney, Laura Romeo, Esq. at (313) 665-4876, or email [laura.romeo@gm.com](mailto:laura.romeo@gm.com).

Please feel free to contact me if you have any questions.

Thanks for your attention to this matter:

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Mr. G. Watkins